|  |  |  |  |
| --- | --- | --- | --- |
| Alamosa District Court |  |  | |
| 702 4th St. |  |  | |
| Alamosa, CO 81101 | DA | TE FILED: December 6, 2017 8:46 AM | |
|  | FIL | ING ID: D52205D0990D7 | |
|  | CA | E NUMBER: 2016CR361 | |
| **Plaintiff: State of Colorado**  **v.**  **Defendant: RICKY MANZANARES** | |  |  |
| Beale C. Tejada #44851 CRANE & TEJADA, P.C.  1544 Race St.  Denver, CO 80206 | |  COURT USE ONLY   Case Number: 16CR361 | |
| Phone Number: 720.512.5871  Fax Number: 970.247.1538  Ema[il: btejada@craneandtejada.com](mailto:btejada@craneandtejada.com) | | Div.: 2 | |
| **MOTION TO APPEAR BY TELEPHONE** | | | |

Mr. Manzanares, by and through counsel, moves this Court to permit him to appear by telephone for tomorrow’s court hearing. In support, he states:

1. Mr. Manzanares is set for a pre-trial readiness conference tomorrow, 12/6/2017.
2. Defense counsel and the prosecution have conferred, and there are no substantive issues that need to be addressed at this hearing.
3. Other than declaring ready for trial, the only outstanding issue that needs to be addressed is Mr. Comar’s previously filed motion to dismiss based on destruction of exculpatory evidence. Defense counsel has submitted a supplement to that motion. Defense counsel believes an evidentiary hearing is not required on that issue and determination of that motion is not dispositive or time-sensitive in this case.
4. Defense counsel resides in Denver, CO. Defense counsel is cognizant of the expenses incurred by the State of traveling down for a brief hearing.
5. This hearing is not expected to be lengthy, and as such, requests this Court to permit him to attend by telephone.
6. Defense counsel apologizes for the late filing of this motion.

Respectfully submitted on December 6, 2017,

/s/ Beale C. Tejada Beale C. Tejada

CERTIFICATE OF SERVICE

I hereby certify that on December 6, 2017, I electronically filed a copy of this document, via ICCES, with the Clerk of the Court. All parties of record were also served.

/s/ Beale C. Tejada Beale C. Tejada